

February 26, 2008

Telelobe America inc.

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VIA ECFS

Ms. Marlene H. Dortch
Office of the Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: Annual CPNI Certification of Telelobe America Inc. – EB Docket 06-36

Dear Ms. Dortch:

Enclosed please find Telelobe America Inc.'s annual CPNI certification. If you have questions, please feel free to contact me at (703) 766-3034 or by e-mail at diana.peneva@tatacommunications.com.

Thank you for your assistance with this matter.

Sincerely,



Diana Peneva

Attachment

cc: fcc@bcpiweb.com



Teleglobe America Inc.
Annual 47 C.F.R. § 64.2009(e) CPNI Certification

EB Docket 06-36

Annual § 64.2009(e) CPNI Certification for 2007

Date filed: February 26, 2008


Name of company covered by this certification: Teleglobe America Inc.

Form 499 Filer ID: 823568

I, David Ryan, certify that I am an officer of Teleglobe America Inc. ("Teleglobe"), and acting as an agent of Teleglobe, that I have personal knowledge that Teleglobe has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. *See 47 C.F.R. § 64.2001 et seq.*

Teleglobe has not taken any actions (proceedings instituted or petitions filed by a company at state commissions, the court system, or at the Commission) against data brokers in the past year. Teleglobe has no information that is not already publicly available regarding the processes pretexters are using to attempt to access CPNI. Teleglobe has updated its CPNI practices and procedures to ensure compliance with the FCC's modified CPNI rules.

Teleglobe has not received any customer complaints in the past year concerning the unauthorized release of CPNI.



David Ryan
Executive Vice President

February 26, 2008

Teleglobe America Inc.
Annual 47 C.F.R. § 64.2009(e) CPNI Certification

EB Docket 06-36

Teleglobe America Inc. ("Teleglobe") is primarily an international carrier serving other carriers, Internet service providers and large enterprise customers. Teleglobe typically transports the "middle" segment only of circuit-switched voice or Voice Over Internet Protocol ("VoIP") international calls. Teleglobe interconnects with U.S. interexchange carriers at the carrier hotel level (above the access tandem level) where traffic is handed off to Teleglobe by its carrier customers, and then Teleglobe transports that traffic to another interexchange carrier, usually overseas, for ultimate termination. Teleglobe also transports traffic handed off to Teleglobe overseas by foreign carriers, into the U.S. Once the traffic is in the U.S., Teleglobe hands off the traffic to a U.S. interexchange carrier (typically a U.S. carrier that, unlike Teleglobe, is interconnected with local exchange carriers) for termination. Teleglobe provides a wide range of international information and data telecommunications services to enterprise customers by means of direct access arrangements connecting such customers with Teleglobe's network. Teleglobe also offers an international calling service to end-user customers, which represents a fraction of one percent of Teleglobe's total revenue.

Teleglobe never uses CPNI in outbound marketing campaigns. Typically, new customers for intermediate segment voice transport service come to Teleglobe, shopping for the best price for their international voice termination requirements. Teleglobe first signs a nondisclosure agreement with the prospective carrier-customer and then markets to them using our price list for traffic termination destinations served. Any intermediate segment enterprise or wholesale voice transport carrier prospects that Teleglobe contacts (*i.e.*, that do not contact us first) are identified through public sources such as industry magazines. Teleglobe attracts new customers for its international calling service by advertising at community events and on select television channels, through Internet banners and search engine keywords, and by placing print ads in select publications. The only instance in which Teleglobe may initiate contact with the customer using CPNI is for billing, maintenance and repair purposes, and to inquire about the customer's satisfaction with its existing services. Since Teleglobe never uses CPNI in outbound marketing campaigns, it does not collect opt-in authorizations from customers for such use.

Furthermore, Teleglobe does not share, sell, lease or otherwise provide CPNI to any of its affiliates, suppliers, vendors or any other third parties for the purposes of marketing any services. The provision of CPNI to any unrelated third party is strictly prohibited except for billing purposes, for the provision, maintenance and repair of services, to protect rights or property of Teleglobe, or pursuant to legal process.

Teleglobe is committed to protecting the confidentiality of all customer information, including CPNI. Teleglobe has implemented password protection for customer access to account information. Teleglobe's customer contracts contain confidentiality requirements regarding the treatment of customer account information, including CPNI,

and Teleglobe employees are prohibited from disclosing such information. All Teleglobe personnel have certified in writing that they have read and will adhere to the Code of Conduct and Business Ethics ("Code"), which contains strict confidentiality requirements for all customer confidential information, including CPNI, and provides for disciplinary action for violation up to, and including, immediate termination of employment. In fact, as part of an overall program of legal compliance training for Teleglobe employees, Teleglobe has begun a series of mandatory web-based training programs that will test, track and record employee training on a variety of legal compliance matters, including training related to the Code. Additionally, at the time of hiring, all new personnel must sign an agreement on Confidential Information, Intellectual Property and Exclusivity Undertakings, which includes confidentiality requirements such as maintaining the confidentiality of customer information. Teleglobe personnel who are authorized to access CPNI are trained in the authorized uses of this information.

Teleglobe is prepared to comply with applicable breach notification laws in the event of a CPNI breach.